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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK DIVISION**

IN RE: PROTON-PUMP INHIBITOR PRODUCTS LIABILITY LITIGATION (NO. II) This Document Relates to: <i>Peter Mos v. AstraZeneca Pharmaceuticals LP</i> 2:18-cv-05435-CCC-MF	MDL No. 2789 JUDGE CLAIRE C. CECCHI MAGISTRATE MARK FALK Case No.: 2:17-md-2789 (CCC)(MF) DECLARATION OF ASIM M. BADARUZZAMAN, ESQ. IN SUPPORT OF MOTION FOR LEAVE TO WITHDRAW AS ATTORNEY OF RECORD FOR PLAINTIFF PETER MOS
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I, Asim M. Badaruzzaman, declare and state as follows:

1. I am an associate of Seeger Weiss LLP, an attorney at law of the State of New Jersey, and counsel of record for the Plaintiff herein.
2. The facts contained herein are within my personal knowledge, and if called upon as a witness I could and would competently testify to the following under oath.
3. Plaintiff, through his Counsel, filed this action in the District of New Jersey on April 4, 2018.
4. On December 13, 2018, Defendants filed a Motion to Compel Plaintiff's Fact Sheet Responses pursuant to Case Management Order No. 9.
5. Since the filing of Plaintiff's complaint, however, a conflict has arisen between

Plaintiff and his Counsel, making it unreasonably difficult for Seeger Weiss LLP to represent Plaintiff in this action.

6. Plaintiff was notified of our Motion for Leave to Withdraw via certified mail to his last known residential address as well as by email.

7. The notice to Plaintiff also advised him that he should retain other counsel.

8. No case-specific discovery has been completed in this matter and no trial date has been set.

9. Should the Court require specificity regarding the conflict and Seeger Weiss LLP's numerous attempts to communicate with Mr. Mos, I respectfully request that the Court permit an *in camera* hearing so that I may provide the Court with such additional information that the Court deems necessary. Should the Court require it, I will also provide the Court with an affidavit, filed under seal, which provides additional detail with respect to the aforementioned conflict.

10. A copy of this Motion has been sent to Plaintiff via certified mail, e-mail, and overnight courier on December 27, 2018.

I declare under penalty of perjury under the laws of the United States of America and the State of New Jersey that the foregoing is true and correct and that this Declaration was executed on this 27th day of December 2018 at Ridgefield Park, New Jersey.

Date: December 27, 2018

RESPECTFULLY SUBMITTED,

/s/ Asim M. Badaruzzaman
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